2015

FCC Wireless Emergency Alert Proposed Rule Making Comments

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Response To FCC Proceeding Number 15-91

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I. FCC Proposes Expanding the WEA Message Length From 90 to 360 Characters

How would this provide more detailed alert information to the public sufficient to motivate appropriate and swift action to save lives and protect property?

Yes, the increase in character limits is needed.

The increase is necessary to allow citizens to receive all pertinent information ensure effective communication and sound decision making.

The character increase allows agencies to provide additional information regarding boil water notices or other information needed to remain safe during the incident. The additional length will also allow for adding URL's and/or phone number for call centers which have been activated to answer additional questions in more detail which citizens may have.

How would this affect accessibility of messaging to people with disabilities, senior citizens, and persons with limited English proficiency?

It is not anticipated that this increase in character limit would have any adverse affect on vulnerable populations.

Instead, the increase should provide these populations with additional tools within the message by which the citizens can seek further information and or clarification.

The increase will also allow for a more definitive message than in the past where messages may not have been fully understood due to the limited amount of space available.

How can we quantify the potential life-saving benefits of increasing the character length?

Quantifying the benefit of increasing the character length at this juncture would be hypothetical at best and lack foundational credibility.

However, it's a reasonable assumption to conclude that messages previously disseminated with the ninety character limitation to not allow for additional information to be included. This increased character length could very well be considered a potentially lifesaving benefit if the new increased message size allows for additional space for safety related information to be added.

Is 360 characters the optimal maximum?

What number of characters is necessary to provide detailed information about the emergency?

360 characters is four times the current limit of 90 and should be considered an optimal maximum. Allowing 0 -360 characters should be enough to accurately provide notification and information of an emergency.

Is it feasible for alert originators to provide both 90 character and 360 character messages to accommodate new and legacy implementations?

It would be efficient and easier for the alert originators to have a single standard by which to adhere to. If the standard is being re-set to 360 characters then originators should only need to worry about the maximum being 360 for all messages. To not do this would add confusion on the user end and possible failed attempts in sending out the messages which are already time sensitive and should not be needlessly delayed.

II. FCC Proposes Adding a New WEA Category Titled "Emergency Government Information" for Non-Emergency Type Messages

How should the FCC define the "Emergency Government Information" category?

Any new category will need to be accurately defined in order to avoid confusion and/or misdirection to an intended audience. On the surface this new category would appear to be appropriate with the caution that its terminology and use should not be to broad as to be subject to agency interpretation; it should provide exact meaning and examples of such messages (i.e. boil water, shelter info, evacuation routes, etc).

Would adding this category of alerts expand the alerting toolkit in a meaningful way?

Yes.
Adding this category would provide agencies the opportunity to specifically target citizens with applicable information. This added clarification in messaging could provide better messaging capability and also reduce confusion to citizens and potentially reduce call volumes to citizen information centers or non-emergency information lines designed to answer questions regarding the incident. It could also allow for specific direct instruction in the event of an in progress emergency such as sheltering in place for and active shooter or tornado touchdown.

Should this category be restricted to be used in conjunction with an Imminent Threat alert, or allowed to be issued as stand alone?

Because not all alerts would be considered an imminent threat we believe this category should stand alone.

What kind of guidelines can be applied to this alert category?

General guidelines for this alert category should provide that only appropriate alert originators have access and that the message should be used to protect lives or safeguard property.

Should this category of alerts be restricted to certain appropriate agencies?

Yes.
If the category name includes "Emergency Government Information" than it should be restricted to government agencies. However, that needs to include all levels of government; local, state and federal.

Would adding this category desensitize the public to other alert categories?

No.
It is not anticipated that this category would desensitize the public. However, like any other alert it must be used appropriately to avoid the possibility of desensitization.

Should this category be an "opt-in" or "opt-out" category?

This category should be handled like all other alert categories and required on all devices unless the user has opted out

Should WEA be broken out into other additional categories (i.e. Severe Weather Alerts, Local Alerts), and if so, how would they be different from Presidential, AMBER, Imminent Threat, or Emergency Government Information categories?

Caution should be used in considering the move to create additional categories.
Doing so could potentially complicate the process of alert messaging by offering too many categories.

III. FCC Proposes Allowing URLs and Telephone Numbers in WEA Messages Which Were Previously Prohibited

Would including URLs and phone numbers in WEA messages advance public safety?

Yes.
Including URL's and phone numbers in WEA messages would advance public safety by providing the opportunity to obtain further information regarding an emergency which would supplement the original limited character alert message.

Does the public currently turn to the internet for additional information when they receive a WEA message?

Yes.
Studies often show that people want to validate information received before acting on the information they have received. With the advent of technology the most expedited/rapid method of validating or seeking additional information is via the internet. This has become more evident as we have a younger population who has grown up with internet capability who often use it as a sole source for news and information.

Would including URLs and phone numbers improve alert quality and accessibility?

Yes.
This would improve alert quality as it gives the public the opportunity to obtain any additional information they may seek either via a specific internet URL and/or phone numbers directing them to citizen information centers or established call centers such as 211/511, etc.

Would including URLs and phone numbers reduce "milling" behavior by directing the public to specific information?

Yes.
As indicated in above answer.

Would including URLs and phone numbers enhance AMBER alerts?

It is anticipated that this would have a positive impact on AMBER alerts as well.

Would including URLs and phone numbers enhance accessibility to those with disabilities, senior citizens, and persons with limited English proficiency?

Yes.
Adding the ability to include URL's and phone numbers would enhance accessibility to successfully reach these audiences and provide additional means for them to gather supplementary information.

Currently WEA supports text only. Would the addition of images, maps, or other multi-media content in the WEA message significantly enhance the usefulness of the system?

Yes.
Additional information that could be added would provide visual support for the text message being delivered. This would more accurately display the information being provided and give the recipient more information to decide what actions they will take in response to the alert message.

IV. FCC Proposes Including Multilingual Wireless Emergency Alert (WEA) Messages

Would the addition of multilingual WEA provide any benefits?

Yes.
Multilingual WEA messages would provide a benefit by reach individuals whom may otherwise not get the alert message. However, care should be addressed when determining the process for translation as translation tools often times do not provide accurate English to (Other Language). This process procedure will need to be identified, vetted and thoroughly tested before being made available to the public alert system.

V. FCC Proposes Improvements to Wireless Emergency Alert (WEA) Geo-Targeting of Alerts

FCC proposes requiring cell carriers to transmit alerts to the polygon level (or closest approximation) as opposed to the county level, and therefore seeks comments on this proposal and rationale

Yes.
Most emergencies often do not affect an entire county. By accurately geo-coding a specific area the message would provide specific and timely information to the correct target audience that is affected.

FCC is considering other approaches would improve geo-targeting (i.e. device-based geo-targeting, cell sectorization), and seeks comments on potential benefits to emergency managers. How would more accurate geo-targeting minimize over-alerting, reduce alert fatigue, and minimize problems of bleed-over

Improving geo-coding capability allows alert originators the ability to target only those areas affected by the emergency and thus reduce the potential for over burdening the public with unnecessary and/or poorly targeted messages.

VI. FCC Proposes Inclusion of Local WEA Test Codes

FCC proposes allowing state and local testing. The approach defines immediate delivery of the test message (vs. allowing cell carriers to delay it up to 24 hours). The approach also provides for a public opt-in (the public would have to enable the test code on their phone) to receive the test message vs. opt-out. Please comment on this approach

Test messages should not be delayed up to 24-hours.
Allowing the public to opt out of messages should be allowed.

There are two alternative approaches being considered, a) delaying test messages up to 24 hours, and b) making public receipt of test messages an opt-out option. Please comment on these alternatives

Test messages should not be delayed up to 24-hours.
Allowing the public to opt out of messages should be allowed.

How often should state and local agencies be allowed to test?

State and local agencies should be allowed to test on a monthly basis. This should allow for flexibility for the needs of individual agencies. At a minimum it should be tested at least twice a year (i.e. prior and ending of hurricane season, winter storm season, etc)

What public safety benefits would come from state and local testing?

State and local testing would provide confirmation that the system is operating as designed prior to a real emergency and also allow the alert originators an opportunity to become more proficient with submitting an alert message

VII. FCC Proposes Requiring Cell Carriers to Log Alerts and Provide Reports

FCC proposes requiring cell carriers to generate monthly system and performance statistics reports based on category of alert, alert originator, alert area, and other alerting attributes

FCC seeks comment on whether cell carriers should report on alert delivery latency, accuracy of geo-targeting, and quality of public response

Please comment on the extent to which this reporting would benefit alert originators.

Yes.
Reports indicated above are needed to confirm the system is accurate and working effectively. Reports such as these often used to track the effectiveness of mass call notification systems and it would prudent to do the same for this.

How should this reporting information be shared?

Should it be restricted?

Reporting information should be shared between applicable cell carriers, the FCC, State Emergency Management agencies and the local alert originators.